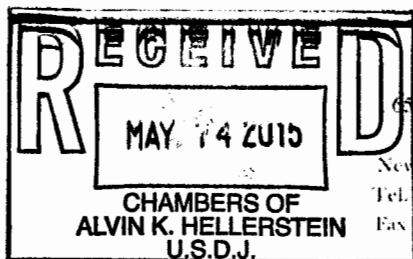


BORRELLI & ASSOCIATES

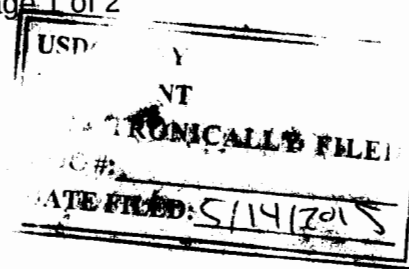
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May 13, 2015

Via Electronic Filing and Facsimile: (212) 805-7942

The Honorable Alvin K. Hellerstein
United States District Judge for the
Southern District of New York
500 Pearl Street, Courtroom 14D
New York, New York 10007-1312

So ordered.
The conference
scheduled for
5/15/2015 is
adjourned to
June 5, 2015 at
10:00am.

Re: Castillo et. al. v. El Tequilazo, et. al., Civil Action No.: 12-cv-3180

Al K. Hellerstein
5/14/2015

Dear Judge Hellerstein:

This office represents Plaintiffs, Carlos Castillo, Daniel Rodriguez, Carlos Palma, Cirilo Jimenez, Daniel Rodriguez, Diego Rodriguez, Jose P. Tlaxco, Natividad Gavilan, Pedro Toxqui Morales, Carlos Palma Escobar and Adrian Gutierrez. Plaintiffs allege that they are former employees of Defendants who violated the Fair Labor Standards Act ("FLSA") and the New York Labor Law ("NYLL"). Plaintiffs respectfully submit this letter to request for an adjournment of the conference currently scheduled for Friday, May 15, 2015.

As the Court is aware, Defendant Abelardo Longas and Defendant Elena Zuluaga filed for Chapter 13 Bankruptcy on December 23, 2014. On April 17, 2015, the Court held a status conference and the parties informed the Court that while the Chapter 13 bankruptcy was still pending, the Defendants/Debtors filed a letter requesting voluntary dismissal of the action. To date, Judge Nancy Hershey Lord has not issued an order regarding the Defendants' request. Per Your Honor's request, on May 12, 2015, this office wrote a letter to the Bankruptcy Court requesting a conference on the matter, specifically requesting direction as to whether a motion for relief from the stay was necessary.

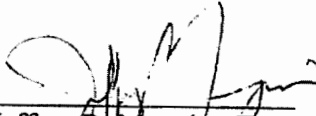
Plaintiffs now await direction from the Bankruptcy Court, and accordingly respectfully request an adjournment of the upcoming status conference in the present action. Counsel for the

Navarro Defendants agrees that an adjournment would best prevent any unnecessary waste of the Court's time.

Both parties, of course, remain fully available to proceed with the conference should the Court prefer that the conference be held as scheduled.

We thank the Court for its time and attention to this matter.

Respectfully,


Jeffrey R. Maguire, Esq.

C: Joshua Fingold, Esq. (via ECF)
Edward V. Sapone, LLC (via ECF)
Benjamin Sharav, Esq. (via ECF)
Victor J. Molina, Esq (via ECF)